

**IN THE NORTHERN DISTRICT OF OKLAHOMA  
UNITED STATES OF AMERICA**

**PHILIP SANDERS, an Individual and  
Husband and Next of Kin of  
BRENDA JEAN SANDERS,  
Deceased,**

**Plaintiff,**

**V.**

**TURN KEY HEALTH CLINICS, a  
limited liability company.**

**Defendant.**

**Case No. 17-cv-492-JED-CDL**

## Attorney Lien Claimed Jury Trial Demanded

**PLAINTIFF'S MOTION TO FILE UNDER SEAL  
EXHIBITS FOR HIS RESPONSE TO DEFENDANT  
TURN KEY'S MOTION FOR SUMMARY JUDGMENT**

Plaintiffs Philip Sanders by and through their attorneys of record, hereby submit this *Plaintiff's Motion to File Under Seal Exhibits for His Response to Defendant Turn Key's Motion for Summary Judgment*. In support of this request, Plaintiff offers the following:

1. Defendant produced its policies and procedures pursuant to the protective order in this case.
2. Defendant deems its policies and procedures are confidential.
3. Further, Plaintiff also anticipates using documents identified as confidential from Creek County Sherriff's office including but not limited to, photographs of the jail and a map of the jail.
4. Plaintiff anticipates using these documents as exhibits to his Response to Defendant's Motion for Summary Judgment.

5. Given the applicability of the Protective Order and the nature of the material contained within the documents in which Defendant Turn Key labeled as “confidential”, Plaintiff seeks to file such exhibits under seal.

WHEREFORE, Plaintiff respectfully requests this Court grant this motion and enter an order authorizing the filing of exhibits under seal.

Dated this 20<sup>th</sup> day of January 2022.

Respectfully submitted,

**RICHARDSON RICHARDSON BOUDREAUX**

/s/ Colton L. Richardson  
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***Attorneys for Plaintiff***

**CERTIFICATE OF SERVICE**

I hereby certify that on the 20<sup>th</sup> day of January 2022, a true and correct copy of the above and foregoing was electronically transmitted to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing and to all the ECF registrants who have appeared in this case.

/s/ Colton L. Richardson  
For the Firm